

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.)
Plaintiff,)
v.) Civil Action No. 04-10353 PBS
VOICE SIGNAL TECHNOLOGIES, INC.,)
LAURENCE S. GILLICK, ROBERT S.)
ROTH, JONATHAN P. YAMRON, and)
MANFRED G. GRABHERR)
Defendants.)

)

**SCANSOFT'S MOTION FOR
RECONSIDERATION OF COURT'S NEUTRAL EXPERT PROCEDURE**

ScanSoft moves for reconsideration of the Court's June 17th order requiring the parties to agree upon a neutral expert for trade secret and infringement discovery. The grounds for this motion are set forth in the accompanying memorandum, which contains material that VST has designated as highly confidential and is thus being filed under seal and will be delivered to the court by hand.

Accordingly, ScanSoft respectfully requests that this motion be granted.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULES 7.1

I certify that on July 1, 2005, counsel for the parties conferred by telephone in an effort to resolve the issues presented in this motion, and that the parties were unable to reach an accord.

Dated: July 1, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Jack C. Schecter

Lee Carl Bromberg, BBO # 058480
Robert Asher, BBO # 022865
Erik Paul Belt, BBO # 558620
Lisa M. Fleming, BBO # 546148
Jack C. Schecter, BBO # 652349
Rebecca L. Hanovice, BBO # 660366
BROMBERG & SUNSTEIN LLP
125 Summer Street
Boston, Massachusetts 02110-1618
(617) 443-9292
jschecter@bromsun.com

02639/00509 415014.1